

JESSE A.P. BAKER (SBN 36077)
jbaker@aldridgepite.com
ALDRIDGE PITE, LLP
The Ogden Building
9311 SE 36th St, Ste 207
Mercer Island, WA 98040
Telephone: (425) 644-6471

Judge: Frederick P. Corbit
Chapter 7
Hearing Location:
Hearing Date:
Hearing Time:
Response Date:

MAILING ADDRESS:
4375 Jutland Drive, Suite 200
P.O. Box 17933
San Diego, California 92177-0933
Telephone: (858) 750-7600
Facsimile: (619) 590-1385

Attorneys for Movant
JPMorgan Chase Bank, N.A.

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON
SPOKANE/YAKIMA DIVISION**

In re:
RTK PRODUCERS, INC.,

Debtor,

Case No.: 20-01798-FPC7

Chapter 7

**DECLARATION IN SUPPORT OF
MOTION FOR RELIEF FROM THE
AUTOMATIC STAY**

I Joanna Uhlin, declare:

1. I am a Special Credits Sr Specialist III with JPMorgan Chase Bank, N.A. ("Chase"). I have personal knowledge of the facts stated herein based upon my review of Chase's books and records in connection with this matter and the J.D. Power/National

1 Automobile Dealers Association ("NADA") Guide, and am authorized to make this Declaration
2 on behalf of Chase.

3 2. I am familiar with the manner in which Chase's books and records are created and
4 maintained, and I regularly use and rely upon these books and records in the performance of my
5 duties. The books and records reviewed in support of this declaration are made electronically
6 and/or by a person at or near the time the events occurred by a person with knowledge of the
7 events they record. The books and records are maintained in the ordinary and normal course of
8 business, and it is the regular practice of the business to make such records.

9 3. On, or about April 18, 2015, RTK Producers, Inc. ("Debtor") and Ralph Phillips
10 ("Co-Borrower", collectively with the Debtor, the "Borrowers") entered into a Retail Installment
11 Sale Contract Simple Finance Charge (the "Agreement") with Chase. Under the Agreement,
12 Borrowers financed the purchase of a 2015 Chevrolet Silverado having VIN #
13 1GC1KWE89FF566969 (the "Vehicle"). A true and correct copy of the Agreement is attached
14 to my Declaration as **Exhibit A**.

15 4. Under the Agreement, Borrowers granted Chase a security interest in the Vehicle.
16 A true and correct copy of the State of Washington Vehicle Certificate of Title reflecting Chase's
17 perfected lien is attached as **Exhibit B**.


18 5. The account matured as of May 2, 2021, making the account due in full.

19 6. As of June 7, 2022, the balance is due in full in the amount of \$9,244.87. A copy
20 of the payment history, and/or account statement, indicating the amounts owed, is attached to my
21 Declaration as **Exhibit C**.

1
2 7. The J.D. Power/NADA valuation, dated June 7, 2022, provides that the Clean
3 Retail value of the Vehicle is approximately \$47,825.00. A copy of the J.D. Power/NADA
4 valuation is attached to my Declaration as **Exhibit D**.

5 Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true
6 and correct.

7 6/30/2022
8 Date


9 Printed Name: Joanna Uhlin
10 Special Credits Sr Specialist III
11 JPMorgan Chase Bank, N.A.
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28